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NERC CIP Standards Update

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Active NERC SDTs

Project 2019-02 BCSI in Cloud SDT made changes to CIP-004 and CIP-011 that have been accepted.

Project 2016-02 CIP Mods SDT has proposed changes for CIP-002 through CIP-013 to address issues on Virtualization and External Routable Connectivity / Interactive Remote Access.

Project 2020-04 CIP-012 Mods SDT has proposed changes for CIP-012 to address availability of communications links and data used for real-time monitoring/assessments to address FERC Order 866.

Active NERC SDTs

Project 2020-03 SDT Supply Chain Low Impact SDT has issued a SAR for CIP-003 to address issues associated with remote vendor access at Low Impact BES facilities. These issues were raised in the NERC Report "*Supply Chain Risk Assessment*", December 2019.

Project 2021-03 SDT TOCC CIP-002 is being formed to address changes to CIP-002 associated with Transmission Owner Control Centers that perform functions of a Transmission Operator. This SDT will use the SAR approved for the 2016-02 SDT.

Project 2019-02 BCSI in the Cloud SDT

The proposed changes made to CIP-004 and CIP-011 were accepted at final ballot on May 10, 2021:

- To allow an entity to add provisioned users
- Eliminates the dependency on known physical storage locations.
- To allow BCSI to stored off-premise in cloud provider storage services.

Project 2016-02 SDT will make conforming changes to CIP-004 and CIP-011

- Changes will be submitted to FERC for approval before Dec 31, 2021

Project 2016-02 SDT CIP Modifications

CIP Version 5 Technical Advisory Group (V5TAG) recommended changes to address on premise virtualization and provide clarifications on External Routable Connectivity (ERC) and Interactive Remote Access (IRA) when used with serial communications.

- The initial ballot on Jan 22, 2021 failed, which proposed changes to CIP-002 through CIP-011 and CIP-013. (CIP-012 changes were not in initial ballot.)
- Subsequent ballots are scheduled for June and Aug, 2021.
- Planned submission of changes to FERC to be completed by Dec 31, 2021

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Project 2016-02 SDT CIP Modifications

Initial ballot comments centered around:

- Issues related to backward compatibility for entities that did not wish to use virtualization.
- The retirement of NERC approved definitions for Electronic Security Perimeter (ESP) and External Access Point (EAP).
- Changes to definitions, Applicable Systems and requirements having complex interplay such that the scope of applicability could not easily be determined.
- The proposed changes for External Routable Connectivity increasing the scope such that the particular situation where all serial connectivity would be incorrectly considered as Interactive Remote Access.

Project 2020-04 CIP-012 Mods SDT

Initial ballot was issued (due June 9, 2021) on proposed changes to CIP-012-1:

- Include requirements for availability of communications and data (used for real-time monitoring and real-time assessments) between Control Centers
- Build on previous changes to NERC Standards TOP-001-4 and IRO-010 that address data availability within Control Centers

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Project 2020-03 Supply Chain Low Impact SDT

The NERC Report "*Supply Chain Risk Assessment*", December 2019 found extensive use of remote vendor access at Low Impact BES facilities. The risks associated with this are not addressed in any existing supply chain type requirements.

- The NERC Board of Trustees approved the creation of a SDT to change CIP-003 to cover remote vendor access as well as detection of malicious communications.
- A SAR was issued to define the scope of the proposed changes to CIP-003.

Project 2021-03 SDT TOCC CIP-002

CIP-002-6 proposed changes to criterion designating BES Cyber Systems at certain Control Centers as either Low or Medium Impact.

- The proposed changes were accepted at final ballot.
- Adopted by NERC BOT and filed with FERC on June 12, 2020.
- Recent cybersecurity events (SolarWinds compromise) prompted NERC Staff to gather more data around whether it was appropriate to move some Control Centers with BES Cyber Systems from Medium to Low Impact ratings.
- NERC CIP requirements are greatly reduced for Low Impact BES Cyber Systems.

Project 2021-03 SDT TOCC CIP-002 (cont.)

- The already approved SAR from Project 2016-02 will be used to create a SDT to propose new changes to CIP-002.
- Further study on the impact of the proposed TOCC changes is being done by NERC with entities within the WECC and TRO Regions.
- The proposed CIP-002-6 TOCC changes mainly affected entities in the WECC and TRE Regions. Both these regions have issued local directives in the interim to address the same issues.

Changes to CIP Requirements

In Effect:

- CIP-013-2, CIP-005-6 and CIP-010-3 changes to address additional supply chain requirements came into effect Oct 1, 2020
- CIP-008-6 changes to address reporting of attempted Cyber Security Incidents came into effect Jan 1, 2021

Future:

- CIP-012-1 changes to address encryption of data communications for real-time monitoring and real-time assessment data will come into effect July 1, 2022

Thank You

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